

1 ROB BONTA
Attorney General of California
2 JAMES ROOT
Senior Assistant Attorney General
3 RANDY M. MAILMAN
Supervising Deputy Attorney General
4 EMILY R. DAHLKE
Deputy Attorney General
5 State Bar No. 322196
1300 I Street, Suite 125
6 P.O. Box 944255
Sacramento, CA 94244-2550
7 Telephone: (916) 210-7550
Fax: (916) 322-2368
8 E-mail: Emily.Dahlke@doj.ca.gov
Attorneys for the People of the State of California

FILED

DEC 14 2021

JAMES M. KIM, Court Executive Officer
MARIN COUNTY SUPERIOR COURT
By: P. Garcia-Pereida, Deputy

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 COUNTY OF MARIN

13
14 **THE PEOPLE OF THE STATE OF**
CALIFORNIA,

15
16
17 Plaintiff,

Case No. SC21²850A

INFORMATION

18 v.

18 **LASHANTE TICARRA BOYD (DOB:**
11/01/1983)

19
20 Defendant.
21

22
23 The Attorney General of the State of California hereby accuses **LASHANTE TICARRA**
24 **BOYD** of the following criminal offenses:

25 ///

26 ///

27 ///

1 **COUNT ONE**
2 **(GRAND THEFT)**

3 On or around December 19, 2016, at and in the County of Marin, the defendant,
4 LASHANTE TICARRA BOYD, committed the crime of GRAND THEFT, a violation of
5 PENAL CODE section 487, subdivision (a) in that defendant LASHANTE TICARRA BOYD did
6 willfully and unlawfully take from CENTER POINT INCORPORATED money and personal
7 property of a value exceeding \$950.00, to wit \$3,264.00.

8 **COUNT TWO**
9 **(GRAND THEFT)**

10 On or around January 25, 2017, at and in the County of Marin, the defendant, LASHANTE
11 TICARRA BOYD, committed the crime of GRAND THEFT, a violation of PENAL CODE
12 section 487 subdivision (a) in that defendant LASHANTE TICARRA BOYD did willfully and
13 unlawfully take from CENTER POINT INCORPORATED money and personal property of a
14 value exceeding \$950.00, to wit \$3,774.00.

15 **COUNT THREE**
16 **(GRAND THEFT)**

17 On or around April 3, 2017, at and in the County of Marin, the defendant, LASHANTE
18 TICARRA BOYD, committed the crime of GRAND THEFT, a violation of PENAL CODE
19 section 487 subdivision (a) in that defendant LASHANTE TICARRA BOYD did willfully and
20 unlawfully take from CENTER POINT INCORPORATED money and personal property of a
21 value exceeding \$950.00, to wit \$2,856.00.

22 **COUNT FOUR**
23 **(GRAND THEFT)**

24 On or around May 8, 2017, at and in the County of Marin, the defendant, LASHANTE
25 TICARRA BOYD, committed the crime of GRAND THEFT, a violation of PENAL CODE
26 section 487 subdivision (a) in that defendant LASHANTE TICARRA BOYD did willfully and
27 unlawfully take from CENTER POINT INCORPORATED money and personal property of a
28 value exceeding \$950.00, to wit \$2,346.00.

1 **COUNT FIVE**
2 **(GRAND THEFT)**

3 On or around May 8, 2017, at and in the County of Marin, the defendant, LASHANTE
4 TICARRA BOYD, committed the crime of GRAND THEFT, a violation of PENAL CODE
5 section 487 subdivision (a) in that defendant LASHANTE TICARRA BOYD did willfully and
6 unlawfully take from CENTER POINT INCORPORATED money and personal property of a
7 value exceeding \$950.00, to wit \$3,162.00.

8 **COUNT SIX**
9 **(GRAND THEFT)**

10 On or around June 19, 2017, at and in the County of Marin, the defendant, LASHANTE
11 TICARRA BOYD, committed the crime of GRAND THEFT, a violation of PENAL CODE
12 section 487 subdivision (a) in that defendant LASHANTE TICARRA BOYD did willfully and
13 unlawfully take from CENTER POINT INCORPORATED money and personal property of a
14 value exceeding \$950.00, to wit \$2,346.00.

15 **COUNT SEVEN**
16 **(GRAND THEFT)**

17 On or around August 7, 2017, at and in the County of Marin, the defendant, LASHANTE
18 TICARRA BOYD, committed the crime of GRAND THEFT, a violation of PENAL CODE
19 section 487 subdivision (a) in that defendant LASHANTE TICARRA BOYD did willfully and
20 unlawfully take from CENTER POINT INCORPORATED money and personal property of a
21 value exceeding \$950.00, to wit \$2,856.00.

22 **COUNT EIGHT**
23 **(GRAND THEFT)**

24 On or around January 5, 2018, at and in the County of Marin, the defendant, LASHANTE
25 TICARRA BOYD, committed the crime of GRAND THEFT, a violation of PENAL CODE
26 section 487 subdivision (a) in that defendant LASHANTE TICARRA BOYD did willfully and
27 unlawfully take from CENTER POINT INCORPORATED money and personal property of a
28 value exceeding \$950.00, to wit \$51,409.08.

1 **COUNT NINE**
2 **(GRAND THEFT)**

3 On or around January 16, 2018, at and in the County of Marin, the defendant, LASHANTE
4 TICARRA BOYD, committed the crime of GRAND THEFT, a violation of PENAL CODE
5 section 487 subdivision (a) in that defendant LASHANTE TICARRA BOYD did willfully and
6 unlawfully take from CENTER POINT INCORPORATED money and personal property of a
7 value exceeding \$950.00, to wit \$3,240.00.

8 **COUNT TEN**
9 **(GRAND THEFT)**

10 On or around January 18, 2018, at and in the County of Marin, the defendant, LASHANTE
11 TICARRA BOYD, committed the crime of GRAND THEFT, a violation of PENAL CODE
12 section 487 subdivision (a) in that defendant LASHANTE TICARRA BOYD did willfully and
13 unlawfully take from CENTER POINT INCORPORATED money and personal property of a
14 value exceeding \$950.00, to wit \$4,620.00.

15 **COUNT ELEVEN**
16 **(GRAND THEFT)**

17 On or around February 22, 2018, at and in the County of Marin, the defendant,
18 LASHANTE TICARRA BOYD, committed the crime of GRAND THEFT, a violation of
19 PENAL CODE section 487 subdivision (a) in that defendant LASHANTE TICARRA BOYD did
20 willfully and unlawfully take from CENTER POINT INCORPORATED money and personal
21 property of a value exceeding \$950.00, to wit \$22,062.10.

22 **COUNT TWELVE**
23 **(GRAND THEFT)**

24 On or around July 20, 2018, at and in the County of Marin, the defendant, LASHANTE
25 TICARRA BOYD, committed the crime of GRAND THEFT, a violation of PENAL CODE
26 section 487 subdivision (a) in that defendant LASHANTE TICARRA BOYD did willfully and
27 unlawfully take from CENTER POINT INCORPORATED money and personal property of a
28 value exceeding \$950.00, to wit \$76,672.45.

**COUNT THIRTEEN
(GRAND THEFT)**

On or around August 20, 2018, at and in the County of Marin, the defendant, LASHANTE TICARRA BOYD, committed the crime of GRAND THEFT, a violation of PENAL CODE section 487 subdivision (a) in that defendant LASHANTE TICARRA BOYD did willfully and unlawfully take from CENTER POINT INCORPORATED money and personal property of a value exceeding \$950.00, to wit \$8,085.00.

**COUNT FOURTEEN
(GRAND THEFT)**

On or around September 26, 2018, at and in the County of Marin, the defendant, LASHANTE TICARRA BOYD, committed the crime of GRAND THEFT, a violation of PENAL CODE section 487 subdivision (a) in that defendant LASHANTE TICARRA BOYD did willfully and unlawfully take from CENTER POINT INCORPORATED money and personal property of a value exceeding \$950.00, to wit \$132,678.78.

**COUNT FIFTEEN
(GRAND THEFT)**

On or around October 9, 2018, at and in the County of Marin, the defendant, LASHANTE TICARRA BOYD, committed the crime of GRAND THEFT, a violation of PENAL CODE section 487 subdivision (a) in that defendant LASHANTE TICARRA BOYD did willfully and unlawfully take from CENTER POINT INCORPORATED money and personal property of a value exceeding \$950.00, to wit \$21,315.00.

**COUNT SIXTEEN
(GRAND THEFT)**

On or around October 9, 2018, at and in the County of Marin, the defendant, LASHANTE TICARRA BOYD, committed the crime of GRAND THEFT, a violation of PENAL CODE section 487 subdivision (a) in that defendant LASHANTE TICARRA BOYD did willfully and unlawfully take from CENTER POINT INCORPORATED money and personal property of a value exceeding \$950.00, to wit \$3,348.00.

1 **COUNT SEVENTEEN**
2 **(GRAND THEFT)**

3 On or around October 9, 2018, at and in the County of Marin, the defendant, LASHANTE
4 TICARRA BOYD, committed the crime of GRAND THEFT, a violation of PENAL CODE
5 section 487 subdivision (a) in that defendant LASHANTE TICARRA BOYD did willfully and
6 unlawfully take from CENTER POINT INCORPORATED money and personal property of a
7 value exceeding \$950.00, to wit \$9,936.00.

8 **COUNT EIGHTEEN**
9 **(GRAND THEFT)**

10 On or around October 13, 2018, at and in the County of Marin, the defendant, LASHANTE
11 TICARRA BOYD, committed the crime of GRAND THEFT, a violation of PENAL CODE
12 section 487 subdivision (a) in that defendant LASHANTE TICARRA BOYD did willfully and
13 unlawfully take from CENTER POINT INCORPORATED money and personal property of a
14 value exceeding \$950.00, to wit \$14,907.18.

15 **COUNT NINETEEN**
16 **(GRAND THEFT)**

17 On or around November 6, 2018, at and in the County of Marin, the defendant,
18 LASHANTE TICARRA BOYD, committed the crime of GRAND THEFT, a violation of
19 PENAL CODE section 487 subdivision (a) in that defendant LASHANTE TICARRA BOYD did
20 willfully and unlawfully take from CENTER POINT INCORPORATED money and personal
21 property of a value exceeding \$950.00, to wit \$3,730.00.

22 **COUNT TWENTY**
23 **(GRAND THEFT)**

24 On or around November 13, 2018, at and in the County of Marin, the defendant,
25 LASHANTE TICARRA BOYD, committed the crime of GRAND THEFT, a violation of
26 PENAL CODE section 487 subdivision (a) in that defendant LASHANTE TICARRA BOYD did
27 willfully and unlawfully take from CENTER POINT INCORPORATED money and personal
28 property of a value exceeding \$950.00, to wit \$17,850.00.

1 **COUNT TWENTY-ONE**
2 **(GRAND THEFT)**

3 On or around November 15, 2018, at and in the County of Marin, the defendant,
4 LASHANTE TICARRA BOYD, committed the crime of GRAND THEFT, a violation of
5 PENAL CODE section 487 subdivision (a) in that defendant LASHANTE TICARRA BOYD did
6 willfully and unlawfully take from CENTER POINT INCORPORATED money and personal
7 property of a value exceeding \$950.00, to wit \$1,470.00

8 **COUNT TWENTY-TWO**
9 **(GRAND THEFT)**

10 On or around January 10, 2019, at and in the County of Marin, the defendant, LASHANTE
11 TICARRA BOYD, committed the crime of GRAND THEFT, a violation of PENAL CODE
12 section 487 subdivision (a) in that defendant LASHANTE TICARRA BOYD did willfully and
13 unlawfully take from CENTER POINT INCORPORATED money and personal property of a
14 value exceeding \$950.00, to wit \$4,358.92.

15 **COUNT TWENTY-THREE**
16 **(GRAND THEFT)**

17 On or around January 10, 2019, at and in the County of Marin, the defendant, LASHANTE
18 TICARRA BOYD, committed the crime of GRAND THEFT, a violation of PENAL CODE
19 section 487 subdivision (a) in that defendant LASHANTE TICARRA BOYD did willfully and
20 unlawfully take from CENTER POINT INCORPORATED money and personal property of a
21 value exceeding \$950.00, to wit \$4,305.43.

22 **COUNT TWENTY-FOUR**
23 **(GRAND THEFT)**

24 On or around January 11, 2019, at and in the County of Marin, the defendant, LASHANTE
25 TICARRA BOYD, committed the crime of GRAND THEFT, a violation of PENAL CODE
26 section 487 subdivision (a) in that defendant LASHANTE TICARRA BOYD did willfully and
27 unlawfully take from DRUG ABUSE ALTERNATIVE CENTER money and personal property
28 of a value exceeding \$950.00, to wit \$20,250.00.

1 **COUNT TWENTY-FIVE**
2 **(GRAND THEFT)**

3 On or around January 31, 2019, at and in the County of Marin, the defendant, LASHANTE
4 TICARRA BOYD, committed the crime of GRAND THEFT, a violation of PENAL CODE
5 section 487 subdivision (a) in that defendant LASHANTE TICARRA BOYD did willfully and
6 unlawfully take from CENTER POINT INCORPORATED money and personal property of a
7 value exceeding \$950.00, to wit \$77,120.00.

8 **COUNT TWENTY-SIX**
9 **(GRAND THEFT)**

10 On or around February 13, 2019, at and in the County of Marin, the defendant,
11 LASHANTE TICARRA BOYD, committed the crime of GRAND THEFT, a violation of
12 PENAL CODE section 487 subdivision (a) in that defendant LASHANTE TICARRA BOYD did
13 willfully and unlawfully take from CENTER POINT INCORPORATED money and personal
14 property of a value exceeding \$950.00, to wit \$1,342.00.

15 **COUNT TWENTY-SEVEN**
16 **(GRAND THEFT)**

17 On or around February 25, 2019, at and in the County of Marin, the defendant,
18 LASHANTE TICARRA BOYD, committed the crime of GRAND THEFT, a violation of
19 PENAL CODE section 487 subdivision (a) in that defendant LASHANTE TICARRA BOYD did
20 willfully and unlawfully take from CENTER POINT INCORPORATED money and personal
21 property of a value exceeding \$950.00, to wit \$63,091.00.

22 **COUNT TWENTY-EIGHT**
23 **(GRAND THEFT)**

24 On or around March 21, 2019, at and in the County of Marin, the defendant, LASHANTE
25 TICARRA BOYD, committed the crime of GRAND THEFT, a violation of PENAL CODE
26 section 487 subdivision (a) in that defendant LASHANTE TICARRA BOYD did willfully and
27 unlawfully take from CENTER POINT INCORPORATED money and personal property of a
28 value exceeding \$950.00, to wit \$4,235.62.

1 **COUNT TWENTY-NINE**
2 **(GRAND THEFT)**

3 On or around April 4, 2019, at and in the County of Marin, the defendant, LASHANTE
4 TICARRA BOYD, committed the crime of GRAND THEFT, a violation of PENAL CODE
5 section 487 subdivision (a) in that defendant LASHANTE TICARRA BOYD did willfully and
6 unlawfully take from CENTER POINT INCORPORATED money and personal property of a
7 value exceeding \$950.00, to wit \$26,782.33.

8 **COUNT THIRTY**
9 **(GRAND THEFT)**

10 On or around April 25, 2019, at and in the County of Marin, the defendant, LASHANTE
11 TICARRA BOYD, committed the crime of GRAND THEFT, a violation of PENAL CODE
12 section 487 subdivision (a) in that defendant LASHANTE TICARRA BOYD did willfully and
13 unlawfully take from CENTER POINT INCORPORATED money and personal property of a
14 value exceeding \$950.00, to wit \$55,147.37.

15 **FIRST SPECIAL ALLEGATION**

16 **[THEFT OF AMOUNT OVER \$100,000 (PENAL CODE SECTION 1203.045)]**

17 It is further alleged that LASHANTE TICARRA BOYD in the commission of the offenses
18 alleged in Count 1 through 30 in this information, with the intent to do so, took funds of a value
19 exceeding one hundred thousand dollars within the meaning of PENAL CODE section 1203.045.

20 **SECOND SPECIAL ALLEGATION**

21 **(EXCESSIVE LOSS OVER \$500,000 (PENAL CODE SECTION 186.11(A)(2)))**

22 It is further alleged pursuant to PENAL CODE section 186.11, subdivision (a)(2),
23 LASHANTE TICARRA BOYD committed two or more related felonies, to wit Counts 1 through
24 30 in this information, a material element of which is fraud, involving a pattern of related felony
25 conduct and the taking of, or resulted in the loss by another person or entity of, more than five
26 hundred thousand dollars.

27 *///*

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

Dated: December 13, 2021

ROB BONTA
Attorney General of California
JAMES ROOT
Senior Assistant Attorney General
RANDY M. MAILMAN
Supervising Deputy Attorney General

EMILY R. DAHLKE
Deputy Attorney General
*Attorneys for the People of the State of
California*

16
17
18
19
20
21
22
23
24
25
26
27
28